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# critical Infrastructure

#### standards

#### geopolitics

people + planet

profit + capital

infrastructures

environment

critical/structure infrastructure jab



## Sanctions and Infrastructural Ideologies

Assessing the Material Shaping of EU Digital Sovereignty in Response to the War in Ukraine

## TL;DR

- EU sanctions against Russian entities are inconsistently implemented across the EU member states;
- For the European Commission this might be a breakthrough for its digital sovereignty agenda because the Council and the Commission were aligned in establishing a digital sovereignty policy that combines economic sanctions and battling misinformation;
- Multistakeholder internet governance functions as an ideological state apparatus, guided by an infrastructural ideology, to increase global connectivity on the interconnection layer;
- The EU functions as a emerging repressive state apparatus by inscribing its norms, through its territorial power, in a part of the global network of networks, but only does so within its borders and on the content layer;
- A global ideological state apparatus increases interconnection while repressive state apparatuses inscribe their regional norms in a process of metagovernance of internet governance.

## interdisciplinarity at work

- Niels ten Oever critical infrastructure lab University of Amsterdam
- Clement Perarnaud Brussels School of Governance Vrije Universiteit Brussel -
- John Kristoff University of Illinois Chicago
- Moritz Müller SIDN Labs and University of Twente
- Max Resing University of Twente
- Arturo Filasto OONI
- Chris Kanich University of Illinois Chicago

How do sanctions aimed at Internet infrastructure align with the EU's approach to Internet governance and its digital sovereignty aspirations?

## Methodology (1)

#### • Network measurements

- We used venture points from the following networks:
  - RIPE Atlas
  - EduVPN
  - Dataplane.org
  - NLNOG RING
  - OONI
- We measured for:
  - reachability (ICMP, TCP, and UDP traceroute probes)
  - Domain Name System (DNS) response (A and AAAA DNS queries over UDP transport)
  - Transport Layer Security (TLS) handshake (Handshake to the IP addresses associated with port 443 on the targets and perform TLS certificate verification)
  - Hypertext Transfer Protocol (HTTP) connection. (HTTP GET request for the / resource. We issue requests over both HTTP (80) and HTTPS (443) where applicable.)

## Methodology (2)

The	Sanctioned organisation	Hostname	Source	Remark/Date added							
	Russia Today English	www.rt.com	Council Decision 2022/351 [11]	1 March 2022							
	Russia Today UK	www.rt.com	Council Decision 2022/351 [11]	1 March 2022							
X	Russia Today Germany	de.rt.com	Council Decision 2022/351 [11]								
100		deutsch.rt.com	Council Decision 2022/351 [11]	1 March 2022							
$\geq$	Russia Today France	francais.rt.com	Council Decision 2022/351 [11]	1 March 2022							
1 2		fr.rt.com	Council Decision 2022/351 [11]	1 March 2022							
	RT en español	actualidad.rt.com	Council Decision 2022/351 [11]	1 March 2022							
- AN		actualidad-rt.com	Council Decision 2022/351 [11]	1 March 2022							
PAR-	Sputnik	www.sputniknews.com	Council Decision 2022/351 [11]	1 March 2022							
- IN		sputniknewslv.com	Council Decision 2022/351 [11]	1 March 2022							
1.8		sputniknews.gr	Council Decision 2022/351 [11]	1 March 2022							
A		sputniknews.cn	Council Decision 2022/351 [11]	1 March 2022							
		radiosputnik.ria.ru	Council Decision 2022/351 [11]	1 March 2022							
-		sputnikglobe.com	Council Decision 2022/351 [11]	Registered 29 March 2023, sput-							
14		spannighovereen	council becasion bobb, our [11]	-							
1				niknews.com now redirects to this							
$\Delta p_{i}$	The second s			domain name.							
0	Rossiya RTR / RTR Planeta	www.rtr-planeta.com	Council Decision 2022/884 [12]	3 June 2022							
$\sim$		rtr-planeta.ru	Council Decision 2022/884 [12]	3 June 2022							
K) die		vgtrk.ru	Council Decision 2022/884 [12]	3 June 2022							
	Rossiya 24 / Russia 24	www.vesti.ru	Council Decision 2022/884 [12]	3 June 2022							
1	TV Centre International	www.tvc.ru	Council Decision 2022/884 [12]	3 June 2022							
		tvci.ru	Council Decision 2022/884 [12]	3 June 2022							
$\mathcal{T}$	NTV/NTV Mir	ntv.ru	Council Decision 2022/2478 [9]	16 December 2022							
K. Pr	Rossiya 1	smotrim.ru	Council Decision 2022/2478 [9]	16 December 2022							
JAC.	REN TV	ren.tv	Council Decision 2022/2478 [9]	16 December 2022							
	Pervyi Kanal	1tv.ru	Council Decision 2022/2478 [9]	16 December 2022							
25	RT Arabic	www.rtarabic.com	Council Decision 2023/434 [13]	25 February 2023							
	Sputnik Arabic	sputnikarabic.ae	Council Decision 2023/434 [13]	25 February 2023							
105	RT en español mirror	esrt.online	Liwest Blocklist [32]	Registered 8 April 2022							
Mer a	All on opposition	esrt.press	Liwest Blocklist [32]	Registered 8 April 2022							
THE	RT Germany mirror	rtde.site	Bundesnetzagentur [6]	Registered 5 March 2022							
1.6	KI Germany million	rtde.xyz	Bundesnetzagentur [6]	Registered 5 March 2022							
1		rtde.team	Bundesnetzagentur [6]	Registered 5 March 2022							
56		test.rtde.live	Bundesnetzagentur [6]	Registered 6 April 2022							
7 × 1		rtde.live	Bundesnetzagentur [6]	Registered 6 April 2022							
X		test.rtde.website	Bundesnetzagentur [6]	Registered 6 April 2022							
12/		rtde.tech	Liwest Blocklist [32]	Registered 6 April 2022							
X		rtde.world	Liwest Blocklist [32]	Registered 6 April 2022							
TT		rtde.me	Liwest Blocklist [32]	Registered 6 April 2022							
XU	A Derech	10		<u> </u>							
No.	A-Russia	a-russia.ru	Bundesnetzagentur [6]	Russian TV streaming site							
3	WWITV: World Wide Internet TV	wwitv.com	Bundesnetzagentur [6]	TV streaming site							
X	glaz.tv	www.glaz.tv	Bundesnetzagentur [6]	TV streaming site							
$\gamma$	Russisches Fernsehen	www.russisches-tv-fernsehen.de	Bundesnetzagentur [6]	TV streaming site							
1	On TV Time	ontvtime.tv	Bundesnetzagentur [6]	TV streaming site							
130	SPB TV World	spbtv.online	Bundesnetzagentur [6]	TV streaming site							
~	Coolstreaming	www.coolstreaming.us	Bundesnetzagentur [6]	TV streaming site							
	Live HD TV	www.livehdtv.net	Bundesnetzagentur [6]	TV streaming site							
	Rossiya Segodnya Group	snanews.de	Liwest Blocklist [32]	German news site							
_	State Duma	duma.gov.ru	OFAC Sanctions list [42]								
	Sberbank	www.sber-bank.by	Council Decision 2022/327 [10]	25 February 2022, Not part of Annex IX							
	or ere such	www.sberbank.ru	Council Decision 2022/327 [10]	25 February 2022, Not part of Annex IX							
	Gazprombank	www.gazprombank.ru	Council Decision 2022/327 [10]	16 December 2022, Not part of Annex							
	Surprovingand		Council Decision 2022/24/0 [7]	IX							

## Methodology (3)

- Policy analysis of public documents analysis from the EU and member states published from 2019 – 2024\*
  - EU digital sovereignty documents
  - EU policies and processes that have accompanied the sanction development and implementation.

\* Corresponding with the Von der Leyen presidency

## Sanctions

#### 1. Sanctions

- a. Economic
- b. Diplomatic
- c. Military
- d. Sports
- e. Environment
- 2. Economic Sanctions are commercial and financial penalties applied against states, group, or individuals
  - a. Trade barriers
  - b. Asset freezes
  - c. Travel bans
  - d. Arms embargoes
  - e. Restrictions on financial transactions
- 3. Effective / Ineffective
  - a. Elites
  - b. Targeted / Untargeted
  - c. Overcompliance

	n the Internet
1998	- Present Day
US-Serbia o- One of the first reported cases of compliance uncertainty	
with sanctions that were imposed to former Yugoslavia,	
Serbia: An American satellite Internet feed provider	9/11 terrorist attack. The US be
reportedly was unclear how it could comply with the US	more aggressively. Sanctions a targeted (early smart sanction
government sanctions and still provide Internet satellite feed to Yugoslavia. The fears stemmed from Executive	Internet specific sanction
Order 13,121, which went into effect on May 1.	had been commercialized but
US-Serbia	later ubiquity. The US tightene
After the Kosovo attack, the Executive Order prohibited a	Afghanistan.
range of trade and a broad supply of goods or services and any related transaction with Serbia and Montenegro.	2009
and any related transaction with Serbia and Montenegro. This event raised some of the earliest (but short-lived)	One of the potential events that
political and compliance uncertainty about sanctions	sanctions relief in the subsequ
and Internet connectivity. In this period, the US issued	uprising that used the Internet
various general licenses that exempted certain technologies and software from sanctions in Serbia. For	communicate to the world what
a clearer picture and more details see Jelena Cosic's	2010
research on this topic.	US sanction relief for personal
UN Sanctions	the Internet for Iran, Cuba, and
UN sanctions <u>Afghanistan</u> , EU issued a <u>Council</u> <u>Regulation</u> prohibiting the export of certain goods and	amending the sanction regulat sanctioned since 1979, Sudan
services to Afghanistan.	place since 1997, and Sanction
	the 60s.
2011 US-Cuba & Europe-Syria o—	
Reports that Cuba could not develop its Internet partly	
due to US embargo, Europe sanctioned Syria.	EU Sanctions (in place since 20 imposition of UN Sanctions) af
	governance organizations, and
Sudan o-	ensure that they were in comp
Sudan's civil society reported frustration with how the US sanctions affected their access to digital technology	while serving certain countries
and to the internet.	2014
	US & EU EU and US sanctions on Russia
	Crimea. Access to domain nam
US-Iran & US-Cuba o- Ease of US embargo on Cuba and specific attention	hampered. Reportedly, the US
to facilitate access to the Internet. To a certain	apply to domain name registra
extent, the sanctions relief worked, but there were	US-Iran US issued iran General License
still reports of restrictions on access to Internet services due to sanctions.	US issued Iran General License Certain Services, Software, and
services due to sanctions.	Personal Communications.
	RIPE NCC became aware that t
The Dutch Ministry of Foreign Affairs confirmed that	entities based in Iran and one i might be on the sanction list. T
they recognized IP resources to be economic resources, as defined in the EU sanctions	might be on the sanction list. I members and created addition
regulations, and therefore <u>RIPE NCC must freeze the</u>	screening processes.
resource if it is provided to a sanctioned entity	
	US-Afghanistan US withdrawal from Afghanista
	US withdrawal from Afghanista takeover. Afghanistan IP addre
US, EU	registered, but it is not clear w
US and EU impose sanctions against Russia because of Russia's invasion of Ukraine. The UK joins the US and	the future. It might be difficult
EU in imposing separate sanctions.	control of these addresses.
The UK issued a license and authorized limited	
transactions to facilitate Civilian Telecommunication	
Services, which are either an "electronic communication network" or "electronic	
communications service" as defined by Section 32 of	
the Communications Act 2003 that is used for civilian	
purposes.	
EU	
European Union usually calls sanctions <u>"European</u> <u>Restrictive Measures</u> ". They also imposed sanctions on	
Russia, and then a so-called <u>"Internet carveout"</u> was	
issued.	
133040.	

gan to use sanction: iso became more ), but there was no vet. The Internet

d not achieved it: ts sanctions on

t led to the provision of int years was the Iranian

ommunication and Sudan (through ons) - Iran has been inctions had been ii

Cuba started in

ince with sanction

ecause of invading s in Crimea was <u>eneral licenses</u> did not

on services. -1, with Respect to Hardware Incident to

o of its member

ember in Syria ey informed the I sanction

n and Taliban ses are still at will happen in o verify who is in

7 after <u>the</u> ected internet they had to re-

o effectively was going on in Irar

The most recent US sanction relief for Iran (Iran GL D-2) is to provide Internet services for the people of Iran as they are partaking in an uprising. It has imposed sanctions on the Minister of Communication along with others due to Internet censorabic.

## Three concepts

a new combination?

- Sanctions
- Digital Sovereignty
- Network Filtering

## Sanctions in the Europe Union

- Sanctions in the European Union are proposed by the The High Representative of the Union for Foreign Affairs and Security Policy
- The High Representative introduces sanctions to the European Council. The European Council consists of government ministers from each EU member state.
- When sanctions are adopted, it is the responsibility of the individual member states to implement the sanctions.
- The European Commission oversees and evaluates the uniform application of sanctions.

## European Digital Sovereignty

"'In French we say "qui fait la norme, détient le marché": "who makes the standard holds the market". [...] If we want to ensure Europe's technological sovereignty in crucial disruptive sectors such as 5G, batteries, hydrogen or quantum technology, we must occupy the field of standard-setting. We must become standard-makers, and not just standard-takers."".

"We were too naive. We were open by default in the belief that things would go our way. But we can't be open at any price."



Thierry Breton – February 2022, Brussels.

Thusfar European **Digital Sovereignty** policy impacts are 'uncertain' at best. (Clement Perarnaud)



## Quick timeline

February 2014 - Russia invaded Ukraine

Annexation of Crimea and illegal military operations in Ukraine's eastern Donbas region by the Russian state.

EU creates two sanctions packages:

- "Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine"
- "Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect
  of actions undermining or threatening the territorial integrity, sovereignty and independence of
  Ukraine"

February 2022 - Russia started a full scale invasion attempt of Ukraine.

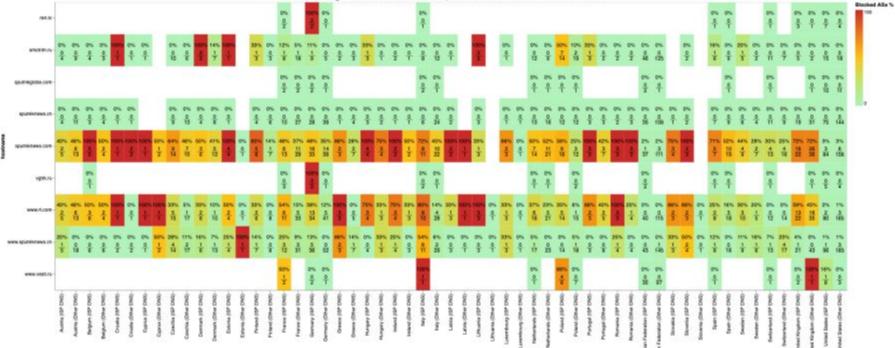
Updates to the sanction packages

### Council Decision 2022/351

*"it shall be prohibited for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by the legal persons, entities or bodies listed in Annex XV, including through transmission or distribution by any means such as cable, satellite, IP-TV, Internet service providers, Internet video-sharing platforms or applications, whether new or pre-installed"* 

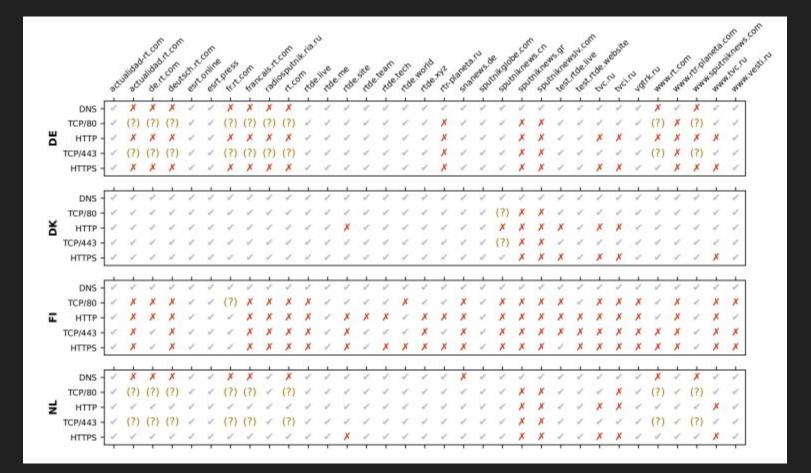
- Caser-Ripolles et al. (2023) qualify this turn as "unprecedented and controversial" and part of strengthening the EU's geopolitical approach towards disinformation.
- Helberger and Schulz (2022) argued further that before the start of the war, such a decision would have been considered "unthinkable" at the EU level, in light of its scope (covering both audiovisual and online media), its consequences for freedom of expression and access to information, but also because media regulation (as a cultural competency) had been mainly left to the responsibility of EU member states until this point in time.
- Indeed, in normal circumstances, "the EU does not have the competence to impose on member states restrictions on the activities of a broadcaster under media law" (Cabrera Blázquez, 2022).
- Sanctions have become the tool enabling the Commission to give more substance to its geopolitical agenda (Portela, 2024).

Sanctioned organisation	Hostname	Source	Remark/Date added
Russia Today English Russia Today UK	www.rt.com www.rt.com	Council Decision 2022/351 [11] Council Decision 2022/351 [11]	1 March 2022 1 March 2022
Russia Today Germany	de.rt.com deutsch.rt.com	Council Decision 2022/351 [11] Council Decision 2022/351 [11]	1 March 2022 1 March 2022
Russia Today France	francais.rt.com fr.rt.com	Council Decision 2022/351 [11] Council Decision 2022/351 [11]	1 March 2022 1 March 2022
RT en español	actualidad.rt.com actualidad-rt.com	Council Decision 2022/351 [11] Council Decision 2022/351 [11]	1 March 2022 1 March 2022
Sputnik	www.sputniknews.com sputniknewslv.com sputniknews.gr sputniknews.cn radiosputnik.ria.ru sputnikglobe.com	Council Decision 2022/351 [11] Council Decision 2022/351 [11]	1 March 2022 1 March 2022 1 March 2022 1 March 2022 1 March 2022 Registered 29 March 2023, sput-
			niknews.com now redirects to this domain name.
Rossiya RTR / RTR Planeta	www.rtr-planeta.com rtr-planeta.ru vgtrk.ru	Council Decision 2022/884 [12] Council Decision 2022/884 [12] Council Decision 2022/884 [12]	3 June 2022 3 June 2022 3 June 2022
Rossiya 24 / Russia 24 TV Centre International	www.vesti.ru www.tvc.ru tvci.ru	Council Decision 2022/884 [12] Council Decision 2022/884 [12] Council Decision 2022/884 [12]	3 June 2022 3 June 2022 3 June 2022
NTV/NTV Mir	ntv.ru	Council Decision 2022/2478 [9]	16 December 2022
Rossiya 1 REN TV	smotrim.ru ren.tv	Council Decision 2022/2478 [9] Council Decision 2022/2478 [9]	16 December 2022 16 December 2022
Pervyi Kanal	1tv.ru	Council Decision 2022/2478 [9]	16 December 2022
RT Arabic	www.rtarabic.com	Council Decision 2023/434 [13]	25 February 2023
Sputnik Arabic	sputnikarabic.ae	Council Decision 2023/434 [13]	25 February 2023
RT en español mirror	esrt.online	Liwest Blocklist [32]	Registered 8 April 2022
RT Germany mirror	esrt.press rtde.site	Liwest Blocklist [32] Bundesnetzagentur [6]	Registered 8 April 2022 Registered 5 March 2022
	rtde.xyz	Bundesnetzagentur [6]	Registered 5 March 2022
	rtde.team	Bundesnetzagentur [6]	Registered 5 March 2022
	test.rtde.live	Bundesnetzagentur [6]	Registered 6 April 2022
	rtde.live	Bundesnetzagentur [6]	Registered 6 April 2022
	test.rtde.website rtde.tech	Bundesnetzagentur [6]	Registered 6 April 2022
	rtde.world	Liwest Blocklist [32] Liwest Blocklist [32]	Registered 6 April 2022 Registered 6 April 2022
	rtde.me	Liwest Blocklist [32]	Registered 6 April 2022
A-Russia	a-russia.ru	Bundesnetzagentur [6]	Russian TV streaming site
WWITV: World Wide Internet TV	wwity.com	Bundesnetzagentur [6]	TV streaming site
glaz.tv	www.glaz.tv	Bundesnetzagentur [6]	TV streaming site
Russisches Fernsehen	www.russisches-tv-fernsehen.de	Bundesnetzagentur [6]	TV streaming site
On TV Time	ontvtime.tv	Bundesnetzagentur [6]	TV streaming site
SPB TV World Coolstreaming	spbtv.online www.coolstreaming.us	Bundesnetzagentur [6] Bundesnetzagentur [6]	TV streaming site TV streaming site
Live HD TV	www.livehdtv.net	Bundesnetzagentur [6]	TV streaming site
Rossiya Segodnya Group	snanews.de	Liwest Blocklist [32]	German news site
State Duma	duma.gov.ru	OFAC Sanctions list [42]	CONTRACTOR OF A DESCRIPTION OF A DESCRIP
Sberbank	www.sber-bank.by www.sberbank.ru	Council Decision 2022/327 [10] Council Decision 2022/327 [10]	25 February 2022, Not part of Annex IX 25 February 2022, Not part of Annex IX
Gazprombank	www.gazprombank.ru	Council Decision 2022/2478 [9]	16 December 2022, Not part of Annex IX



ASs blocking access to Russian sanctioned sites, OONI measurements from 2022-08-01 to 2023-04-25

	Austria	Belgium	Bulgaria	Croatia	Cyprus	Czechia	Denmark	Estonia	Finland	France	Germany	Greece	Hungary	Ireland	Italy	Latvia	Lithuania	Luxenbourg	Malta	Netherlands	Poland	Portugal	Romania	Slovakia	Slovenia	Spain	Sweden	United Kingdom	Switzerland	Russian Federation	United States
ASes	9	6	6	3	2	11	11	2	10	16	36	5	3	6	16	3	z	1	1	9	6	5	5	3	4	6	11	27	18	47	45
Upstream resolvers	28	23	10	3	6	38	17	3		107	190	8	5	16	37	4	3	2	4	48	18	16	15	6	9	14	38	109			253
VPs	66	131	18	8	5	56	33	6	71	675	657	22	21	57	106	5	3	2	4	224	30	312	16	8	15	69	66	196	225	116	687
www.rt.com	10	0	45	0	0	53	63	0	4	3	19	0	0	30	19		0	0	0	9	19	0	0	0	0	32	80	75	-99	100	98
de.rt.com	12	3			0	56	54			4					100	50	0		0	- 6		1	0		12	66	81	75	100	100	99
deutsch.rt.com	3				-0	50	63								100		100		0	67	25	100	0		0	71	83	75	100	94	99
francais.rt.com	0	3			0	50	70	0			25				28	50	0		0	- 6 -		1	0		0	68	80	71	100	95	98
fr.rt.com	11	50			0		63			2	94				100		100		0	70	25	98	0		22	71	88	73	100	100	99
actualidad.rt.com	14	1	25	0	0	37	58	0	2	4	24	0	0	27	98		0	0	0	7	23	1	0	0	16	68	79	74	100	95	99
actualidad-rt.com	18	100	100	83	100	100	100	100	100	- 99	- 99	100	100	100	100	100	100		100	99	100	100	100	100	100	100	100	100	100	100	100
www.sputniknews.com	8	51	42	0	0	50	60			- 4	26	0	58		22		0		0	8	100	10	100		14	100	83	72	99	96	99
sputniknewslv.com	100	6	42	100	-0	52	60		0	57	60	100				25		100		-44	100	100	100		14	100	81	100	100	100	99
sputniknews.gr	100	3	25	66		46	72	0	0	57	01	11			34	50		100		43	100		-			100		98	100	100	99
sputniknews.cn	100	3	33		_0	53	72		-4	55	57	100	33	31	31	50	100	100	0	42	100	100	100		11	100	93	99	100	100	100
radiosputnik.ria.ru	13	35	55	100	100	75	100	0	4	99	100	100	100	100	100	50	100	0	0	100	21	100	100	1	100	100	84	99	100	97	100
sputnikglobe.com	_	-	100	100	100		100	100	100		100	100	100	100	98		100	100	100	100			100	60	100	100	100	100	100	100	98
www.rtr-planeta.com	26	_	100		100			100			99	100			100			100			35			100			100		100		100
rtr-planeta.ru	- 4	100	100			100		1.00	100		100			100				100		100				100					100		100
vgtrk.ru		100	100	100	100			100	52	100	37			100		_		100		100		99	100		100		100	100	100	100	100
www.vesti.ru	13	60	100	60		100	91	0	85	56	99		100		98	50		100		100	19	87	100		100		100	100	100		100
www.tvc.ru	-4	16	100	66		100	90	0	86	56	81	100	100	100	100	50	100	100	0	46	100	87	100	100			100	100	100	100	100
ntv.ru	13	41	100		100		90	0	51	100	33	100	100	90	100	-50	100	100	100	100		13	100	100	100	100	100	100	100	100	100
smotrim.ru	100	59	100		100		90	0	52	60	30		100	ALC: NO.	100			100		100		12	100		100		100	.98	100	100	100
ren.tv	15	3	100			100	92	0	52	99	30	100	100	43	100		100	100		100		12	100	66	100	100	100	100	100	97	.99
ltv.ru	24	1	100		100		90	0	47	99	37			100		50		100		100				100					100		100
ww.rtarabic.com	15				100		100	0	83	59				100						99						100			100		
sputnikarabic.ae	17	100	100	100	100	100	100	-0	51	58	48	100	100	100	100	100	100	100	100	47	100	85	100		100	100	100	100	100	100	99
esrt.online	18	100	100	100		100	100	100	100	99	-99	100	100	100	100		100	100	100	99	100	99	100	100	100	100	100	100	100	100	99
esrt.press	21	100	100	100	100	100	100	100	100	99	.99	100	100	100	98		100	100	100	100	100	100	100		100	100	100	100	100	97	100
rtde.site	12	100	100	100		100	100	100	100	100	26	100	100	100	98	50	100	100	100	99	100	99	100	100	100	100	100	100	100	97	100
rtde.xyz	8	100	100	100	100	100	100	100	100	100	.29	100	100	100	100	50	100		100	100	100	99	100	0.0	100	100	100	100	100	100	100
rtde.team	17	100	100	100	100	100	100	100	100	.99	28	100	100	100	98	0	100		100	99	100	53	100	100	100	100	100	-99	100	100	100
test.rtde.live	18	100	100	100	100	100	100	100	100	100	25	100	100	90	100	-50	100	100	100	99	100	47	100	100	100	100	100	99	100	100	100
rtde.live	17	100	100	100	100	100	100	100	100	100	99	100	100	100	100	50	100	100	100	100	100	40	100	100	100	100	100	99	100	100	100
test.rtde.website	100	100	100	100	100	100	100	100	100	.99	25	100	100	100	100		100	100	100	100	100	99	100		100	100	100	100	100	100	.99
rtde.tech	8	100	100	100	100	100	100	100	100	99	29	100	100	100	100	100	100	100	100	100	100	100	100	66	100	100	100	100	100	97	100
rtde.world	16	100	100	100	100	100	100	100	100	100	32	100	100	90	100	100	100	100	100	100	100	56	100		100	100	100	100	100	100	100
rtde.me	16	100	100	100	100	100	100	100	100	100	27	100	100	100	98		100	100	100	100	100	100	100	66	100	100	100	100	100	100	99
a-russia.ru	100	100	100	66	100	100	100	5	100	99	30	100	100	90	97	25	100	100	100	100	100	99	100	100	100	100	100	99	100	100	99
wwity.com	100	100	100	100	100	100	92		100	99	30	100	100	100	100	25	100	100	100	100	100	89	100	100	100	100	100	100	99	100	100
www.glaz.tv	100	100	100	66	100	100	100	0	100	100	41	100	100	100	100	-	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
www.russisches-tv-fernsehen.de		100									100			100			100	100	100	100	100	100	100		100	100	100	100	100	100	99
ontvtime.tv	100	_	100		100		92	0		99			100			100			100	100	100	100	100		100				100	100	100
spbty.online					100				100					90				100			100	86		100			100		100		100
www.coolstreaming.us	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100		100	100	100	100	100	100	100		100	100	100	100	100	100	99
www.livehdtv.net	100	100			100						44			100			100	100	100	100	100	99	100	100	100	100	100	100	100	100	100
snanews.de	16	1	62	50	0	-	_	100	0	55	25	100	0	27	92	100			0.	99	100	99	100		33	100	100	100	100	100	98
duma.gov.ru	100	100	100	100	100	100	100	100	100	100	100	100	100	100	98		100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
www.sber-bank.by		100	100	100			100		100		100	100	100	100	96		100	100	100	99	100	100			100				100	100	99
www.sberbank.ru		100	100		100				100		100	100			98		100	100	100		100	99		100					100	100	100
www.gazprombank.ru					75						***			100						100				100					99		
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## **Bohužel / Unfortunately**

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Informaciją apie asmenų, neteisėtai vykdančių televizijos programų ir (ar) atskirų programų platinimo internete Lietuvos Respublikos vartotojams, veiklą galite rasti čia.

Dėl išsamesnės informacijos prašome kreiptis į Lietuvos radijo ir televizijos komisiją,

tel. (8 5) 233 0660, faks. (8 5) 264 7125, e. p. lrtk@rtk.lt.

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Please refer to Council Regulation (EU) 2022/350 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine

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### Conclusions (I) - Sanctions

- Sanctions against Russian entities are inconsistently implemented across the EU;
- Can at least in part be contributed to the high-level and technology neutral description of the sanctions and the lack of recommendations for technical implementation;
- Implementation of the sanctions was largely left to the interpretation of network operators and guidance and interpretation provided by national authorities in EU member states (if any);
- The technical methods used for implementing the blocks are not transparent in most cases;
- End users are not adequately informed that the reason they cannot access the requested resource is due to EU mandated filtering.

## Conclusions (II) - Digital Sovereignty

- It is still very easy to find content from Russia Today and Sputnik online, both through mirror sites as well as aggregate sites;
- While these sanctions can be categorised as an economic measure, these sanctions must also be understood in the broader context of recent EU policies tackling online disinformation and foreign interference;
- Diffuse implementation might be basis to say that this had limited impact to increasing the EU's digital sovereignty;
- However, first large online content regulation measure by the EU;
- Evaluation by the Commission might lead to more uniform implementation.

## Conclusion (III) - Theoretical Contribution

- Multistakeholder internet governance functions as an ideological state apparatus, guided by an infrastructural ideology to increase interconnection;
- The EU functions as a emerging repressive state apparatus by inscribing its norms, through its territorial power, in a part of the global network of networks, but only does so within its borders and on the content layer;
- A global ideological state apparatus increases interconnection while repressive state apparatuses inscribe their regional norms in a process we call the metagovernance of internet governance.

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